

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

KEITH SOTH,
Plaintiff,

CASE NO.

vs.

Judge
Magistrate Judge

TRANS UNION, LLC, a Delaware
limited liability company; EQUIFAX
INFORMATION SERVICES, LLC,
a Georgia corporation; and CAPITAL
ONE BANK USA, N.A., a foreign
corporation,
Defendants.

TRANS UNION, LLC'S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC ("Trans Union") hereby removes the subject action from the 53rd Judicial District, Oakland County, Michigan, to the United States District Court for the Eastern District of Michigan, on the following grounds:

1. Plaintiff Keith Soth served Trans Union on or about September 21, 2015, with a Summons and Complaint filed in the 53rd District Court, Oakland County, Michigan. Copies of the Summons and Complaint are attached hereto, redacted pursuant to Federal Rule of Civil Procedure 5.2, as **Exhibit A** and **Exhibit B**. No other process, pleadings or orders have been served on Trans Union.

2. Plaintiff makes claims under, alleges that Trans Union violated and alleges that Trans Union is liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the “FCRA”). See Complaint ¶¶ 24-37.

3. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

4. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the 53rd Judicial District Court, Oakland County, Michigan, to the United States District Court for the Eastern District of Michigan.

5. As of the date of this Notice Of Removal, Defendants Experian Information Solutions, Inc. (“Experian”) and Capital One Bank USA, N.A. (“Capital One”) have not been served.

6. Notice of this removal will promptly be filed with the 53rd Judicial District, Oakland County, Michigan and served upon all adverse parties.

WHEREFORE, Defendant Trans Union, LLC, by counsel, removes the subject action from the 53rd Judicial District, Oakland County, Michigan to this United States District Court, Eastern District of Michigan.

Dated: September 23, 2015

Respectfully submitted,

s/ Justin T. Walton

Justin T. Walton, Esq. (IN #29540-49)

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CERTIFICATE OF SERVICE

I, **Justin T. Walton**, hereby certify that on the **23rd day of September, 2015**, I electronically filed the foregoing with the Clerk of the Court using the ECF systems which will automatically send notification of such filing to the following counsel of record:

None.	
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I further certify that on the **23rd day of September, 2015**, a copy of the foregoing was sent via U.S., First Class Mail, postage prepaid to the following non-ECF participants:

<u>for Plaintiff Keith Soth</u> Gary D. Nitzkin, Esq. Travis Shackelford, Esq. Nitzkin & Associates 22142 West Nine Mile Road Southfield, MI 48033	
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s/ Justin T. Walton

Justin T. Walton, Esq. (IN #29540-49)

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